HPNS Technical Team Meeting Agenda October 16, 2018, 1000-1100 PT

1. Welcome and check-in

Navy BRAC – Steve Banister, Pat Brooks, Danielle Janda, Derek Robinson, Thomas Macchiarella

Navy BRAC Consultants – Craig Bias, John Hackett, Scott Hay, Kim Henderson, Kathy Higley, Alex Lopez

RASO – Zach Edwards, Matt Liscio, Matt Slack

EPA and consultants – Karla Brasaemle, John Chesnutt, Jana Dawson, Donna Getty, David Kappelman, Jackie Lane, Lily Lee, Lyndsey Nguyen

DTSC - Nina Bacey, Janet Naito

CDPH – Sheetal Singh, Matt Wright

City (includes OCII/SFDPH and consultants) – Amy Brownell, Bob Burns, Christina Rain, Dorinda Shipman

Water Board - Tina Low, David Tanouye

- 2. EPA staffing Lily received a promotion and management is looking into a replacement. Lily will notify the team via email once she receives further direction on a transition plan.
- 3. Parcel G and background soil work planning
 - RTCs to regulators 10/11
 - i. Feedback? The agencies will provide an email response to the Navy by Monday morning to indicate comments that need further clarification. Discussion on comments were as follows:
 - 1. Nina noted that there were a few responses to DTSC comments that need clarification (for example, comment 9 regarding allegations refers to the changes in the work plan, and a comment where EPA general comment 2 was referred to that did not fully address a comment).
 - a. The RTCs were intended to be provided with the draft final work plan for review concurrently but were provided earlier as requested. It is understood that the RTCs will need to be reviewed with the draft final work plan text and revisions.
 - b. Navy legal is reviewing the language based on RTC 9 and Nina indicated the comment was from DTSC legal and they will need to review the revised text.
 - 2. Sheetal asked if the SAP RTCs will be provided earlier than the draft final.
 - a. The Navy is still working on the SAP RTCs and the draft final SAP and RTCs will be included as an appendix to the draft final work plan. Sheetal and Matt will contact technical staff (Matt Liscio, John Hackett, Alex Lopez) for specific technical questions on responses.
 - 3. Sheetal questioned how the past RACRs and addendums will be handled.

- a. The new RACRs would likely replace the previous and Danielle will confirm with management.
- 4. Karla asked for clarification on the response to EPA general comment 2 regarding that there are no longer phases for former building SUs.
 - a. Since surface scanning was added based on the comments, the investigation approach is the same for all soil SUs and 100% of the SUs will be investigated.
- 5. Karla asked for clarification on the response to EPA general comment 22 that states "Erosion and runoff are natural processes that should be characterized to establish variability in background." and how that will be done.
 - a. The response is just pointing out that the Navy is trying to evaluate the range of Cs-137 in background, including downslope soil samples, since some parcels include downslope soil areas
- 6. Dave asked for clarification on alpha and gamma spec analysis, for confirmation on whether the lab will report anything detected, MDCs and error bars, and availability of lab and data validation packages.
 - Alpha spec is planned primarily for equilibrium evaluation. Ra-226 will be analyzed by both alpha and gamma spec for comparison. The nuclides were discussed and are included in the draft final work plan.
 - b. Any nuclides detected will be reported.
 - The lab can meet the MDCs listed on Worksheet 15 (the SOPs are general) and clarification was added to the SAP. The specific MDCs and error bars will be sample-specific.
 - d. The lab data packages and third-party data validation reports can be provided as requested. The data validation subcontract has not been awarded yet.
 - e. Matt questioned the response to EPA comment 12 regarding the number of RBA samples and calculations based on 6 data sets and the percent confidence. Matt will contact John and Alex to discuss the number of RBA samples and instrument for surface scans regarding the gross gamma threshold. Donna indicated that the offsite data should not be used in the calculation for the number of samples.
 - Onsite datasets will be combined based on the statistics. There is also a potential for combining the Cs-137 offsite and onsite data.
 - f. Donna indicated that the language in the 2nd bullet of the response to EPA general comment 2 regarding point-by-point comparisons should indicate that the RGs are based on concentrations above background and that statistically-based decisions will be made. Even though the approach does not follow MARSSIM, there is some form of decision statistics (e.g., mean, UTL, USL) that will be used.
 - i. Danielle indicated that the Navy feels that based on the use of MARSSIM to calculate the number of samples,

MARSSIM should also be used to demonstrate compliance. It was important to the DASN that the RTCs reflect this and that the approach at HPNS not create a precedent for other sites. Lily indicated that EPA's guidance that is being applied is more conservative and provides a positive message. The Navy is hopeful that because the regulators' approach was accepted, the agree to disagree language is sufficient, and the work can move forward.

- Draft Final Work Plan to regulators by 10/26
 - i. Will include Draft Final SAP and RTCs
 - ii. Discuss contents for appendix with comments/RTCs Only the RTCs need to be included.
- 4. Findings reports
 - Pending Navy review of RTCs and draft final
 - i. Parcels B and G Soil
 - ii. Parcels D-2, UC-1, UC-2, and UC-3 Soil
 - Pending EPA comments schedule? Lily will get back to the Navy on the schedule for comments. If possible, the Navy would like to finalize the reports before Pat retires in mid-January.
 - i. Buildings
 - ii. Parcel C Soil
 - iii. Parcel E Soil
- 5. Future calls/meetings
 - Status call 11/6/18, 1000-1100 PT